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MATTER NO.

296-001

February 14, 2023

**VIA CM/ECF**

Hon. Sarah L. Cave  
United States Magistrate Judge  
Southern District of New York  
500 Pearl Street, Courtroom 18A  
New York, New York 10007

**RE: Flynn v. Cable News Network, Inc.**  
**Case 1:21-cv-02587 (GHW/SLC)**

Dear Judge Cave:

I represent Plaintiffs, John P. “Jack” Flynn and Leslie A. Flynn (the “Flynnns”) in this matter. Pursuant to § I(A) and II(C)(2) of the Court’s Individual Practices, I request a discovery conference with the Court to obtain an order compelling Defendant Cable News Network, Inc. (“CNN”) to produce available dates for the deposition of Anderson Cooper.

Mr. Cooper is a witness with information relevant to the facts alleged in Plaintiffs’ amended complaint, including the matters stated in ¶¶ 2 and 15. Mr. Cooper also has knowledge of the QAnon belief system as described by Donie O’Sullivan in the following video: <https://www.youtube.com/watch?v=gufvLjAQsQs>.

**Certification**

Pursuant to Local Civil Rule 37.2, counsel for the Plaintiff requested dates for the deposition of Anderson Cooper on January 23, 2023 and January 31, 2023, and a telephonic conference to discuss CNN’s refusal to provide dates. Counsel for CNN completely ignored the matter, and has failed to provide dates. The parties are at an impasse.

Yours very truly,

*/s/ Steven S. Biss*

Steven S. Biss

cc. Anthony C. Carlini, Jr., Esq.